

Rads Rule sampling: time is running out

Time is running out for community water systems (see CWS definition, page 2) to “grandparent” radiological samples under EPA’s Radionuclides Rule (Rads Rule). “Grandparenting” refers to samples taken between June 2000 and December 8, 2003 that can be used, *if eligible*, to satisfy the initial monitoring rule requirements beginning in 2004.

Without eligible grandparented samples, community water systems (CWS) will have to take four quarterly samples of radiologicals between 2004 and 2007. Idaho DEQ is urging each CWS to submit samples for gross alpha, radium 228, radium 226, and uranium for each entry point prior to the December 2003 deadline. There are only five labs in Idaho

certified to perform radium 228 analysis (see lab list below):

A sample eligible for grandparenting will be a sample taken between June of 2000 and December 8, 2003, and will fall into one of the categories below:

- 1) A sample taken at the entry point to the distribution, and the result is less than the maximum contaminant level (MCL), or
- 2) A sample taken within the distribution system for systems that serve less than 3,300 persons and with less than three entry points, and does not exceed the values shown in the table below.

Analyte	1 Entry-Point	2 Entry-Point	3 Entry-Point	Detect Limit	MCL
Gross alpha*	< 15 pCi/L	< 7.5 pCi/L	< 5 pCi/L	3 pCi/L	15 pCi/L
Radium-226*	< 5 pCi/L	< 2.5 pCi/L	< 1.7 pCi/L	1 pCi/L	Combined 5pCi/L
Radium-228	< 5 pCi/L	< 2.5 pCi/L	< 1.7 pCi/L	1 pCi/L	
Uranium*	< 30 pCi/L	< 15 pCi/L	< 10 pCi/L	NA	30 µg/L; 27-30 pCi/L

*Gross alpha may substitute for radium 226 and/or uranium in some circumstances, but not for radium 228.

Operator convicted of submitting false documents jailed

In February 2003, the state of Idaho sought a revocation of probation for Matthew Olivas after he failed to obtain a drinking water operator's certification as ordered by the Court in August of 2001.

Olivas had previously been convicted of failing to obey a DEQ Consent Order after submitting a false water sample to the state. As part of his probation, Olivas was ordered to obtain a valid drinking water operator's certification. Olivas failed to do so and Ada County Magistrate Watkins revoked Oliva's probation and sentenced him to five days in jail.

Further proceedings may not be needed because Olivas is in the process of being evicted from the premises where he operated the public drinking water system. ■

• Energy Labs	Billings, MT	307-235-0515
• General Engineering Labs	Charleston, SC	843-556-8171
• Paragon Labs (3 sample min)	Fort Collins, CO	970-490-1511
• Severn Trent Labs	Richland, WA	509-375-3131
• Washington State Health Lab	Shoreline, WA	206-361-2822

The new Rads Rule is complex (even for those who work with the rule), so if you have questions, please contact your local DEQ or Health District representative. ■

2002 CCRs due July 1 for community water systems

CCRs for calendar year 2002 are due no later than **July 1, 2003**. CCR template packets will be mailed in mid-April. In the meantime, the four-page template with instructions is available on DEQ's web site at <http://www.deq.state.id.us/water/dw/ccr.htm>. ■

Drinking water system security news

42 systems must meet requirement

Community water systems serving more than 3,300 must prepare vulnerability assessment (VA)

The Public Health Security and Bioterrorism Preparedness and Response Act of 2002 amended the Safe Drinking Water Act to require every community water system (*see CWS definition below*) that serves a population of greater than 3,300 to implement new security measures. The required measures are listed below with due dates shown in the table.

1. Conduct a VA of their systems. The purpose of a VA is to evaluate weaknesses to potential threats and identify steps that can reduce the risk of serious consequences from attack or acts of vandalism. (In Idaho, this will mean that 42 community water systems must complete a VA. These 42 systems represent two-thirds of the population served by public water systems in Idaho.)

2. Certify and submit a copy of the VA to the Region X EPA Administrator.

3. Prepare or revise an "emergency response plan" that incorporates the results of the VA.

4. Certify to the Region X EPA Administrator in Seattle, within six months of completing the VA, **that the system has completed or updated its emergency response plan.**

EPA is working directly with the nation's community water systems that must complete VAs. By now, EPA has contacted Idaho's 42 systems that serve more than 3,300 persons. Additional information regarding training, VAs, and emergency response tools can be found at the EPA web site: <http://www.epa.gov/safewater/security>.

What is a community water system?

A community water system is a public water system that serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents (e.g., a municipality, subdivision, mobile home park, apartment complex, or nursing home). If you are still uncertain about what type of a public water system you are, you can contact your local DEQ regional office or local health district to check your system's designation.

DEQ urges all systems serving 3,300 or less to complete vulnerability assessments

Even though only community water systems serving 3,300 or more persons are required to conduct a vulnerability assessment and to prepare an emergency response plan, the DEQ urges all systems to prepare these security aids for their own protection.

To assist small systems, the Association of State Drinking Water Administrators' (ASDWA) web site, <http://www.asdwa.org/>, provides a Security Vulnerability Self-Assessment Guide targeted for drinking water systems serving less than 3,300 people. ASDWA and the National Rural Water Association (NRWA) developed the guide in cooperation with the U.S. EPA.

See DEQ's web site for additional security information

Systems can find more information under "Security" at the DEQ's web site at <http://www.deq.state.id.us/water/water1.htm>. The Security Section contains the following:

- ☐ **Public Water System Emergency Response Plan Guide.** This sample form (in Word) serves as a guide for public water systems wanting to adopt an emergency response plan.
- ☐ **Public Water System Emergency Contact Information Form.** If a water system would like to receive notification about emergencies or major disasters that may effect the state's systems, they can fill out and submit this form on-line. (See *Notice*, next page)
- ☐ **Special Security Issue #23 of DEQ's Drinking Water Newsletter.** Issue 23 offers guidelines and suggestions for protecting your public drinking water system through increased security measures.
- ☐ **Water Haulers.** This list includes companies certified by their local health districts to haul drinking water in emergency situations. ■

Due Dates: Vulnerability Assessments / Emergency Response Plan Certifications

Community water systems
serving populations shown below:

Certify and submit
Vulnerability Assessment (VA)
by the following dates:

To Certify to EPA that **Emergency Response Plan** *was completed within 6 months of VA, but no later than dates below:*

100,000 or greater

March 31, 2003

September 30, 2003

50,000 - 99,999

December 31, 2003

June 30, 2004

3,301 - 49,999

June 30, 2004

December 31, 2004

3,300 or less

Not required by statute

Not required by statute

Contamination emergencies

When to call and what to do

Contamination emergencies

What should you do if you believe that there is a suspected or intentional contamination or intrusion into your public water supply system or facility?

You need to call Idaho's Com Center (1-800-632-8000) immediately, which will trigger an emergency response telephone conference between you and various state and local officials. This individual, trained in their areas of expertise, will advise you how to proceed.

When should you call the Com Center?

You should call when your system may have experienced any of the following scenarios:

- Physical security is compromised or there is obvious evidence of accidental or malicious intrusion.
- There is evidence of vandalism that may suggest intrusion leading to an added vulnerability of the system (e.g., hole in fences or gates, barbed wire cut, locksets removed or destroyed, etc.).
- Suspicious materials have been found around a site which is part of, or associated with, a public water supply (e.g., discarded packaging, plastic bags, unlabeled and discarded containers, evidence of marks indicating devices were dragged across the ground, vehicle tracks, etc.).
- An anonymous threat directed at the facility.

What to do

- ☐ If your concern meets any of the "when-should-you-call" circumstances shown directly above and you suspect intentional and criminal contamination, contact Idaho's Com Center at 1-800-632-8000. If that telephone number is busy, call the alternative Com Center telephone number: 1-208-846-7610. *Clearly indicate that your call concerns a threat to a drinking water system.*
- ☐ For those systems that chlorinate, maintain adequate chlorine residual.
- ☐ Notify your customers not to drink the water until you notify them that the water is safe to drink.
- ☐ Keep your customers informed.

NOTICE

BDS will use DEQ's emergency contact list to notify systems

The purpose of this notice is to let systems know that the Idaho Bureau of Disaster Services (BDS) has requested that DEQ allow it to use the state's emergency contact list in case of a state emergency.

As you probably know, DEQ maintains an electronic list of emergency contact names and telephone numbers for the state's public drinking water systems in case of a national emergency or disaster. Inclusion on the list is voluntary.

BDS intends to use the emergency contact telephone numbers for a telephone-based warning system that sends emergency notification messages to public officials throughout the state. This system is known as the State Automated Warning System (SAWS).

BDS performs monthly system tests on the 10th of each month, unless the 10th is on a weekend, in which case the test occurs on the following Monday. Monthly tests are performed at 10:00 a.m. and consist of a 48-second pre-recorded message.

Test messages are disseminated to all telephone numbers included on the daytime contact list only. BDS does not conduct tests using after-hours numbers.

If you are not on the DEQ emergency contact list and would like to be, you can do one of the following:

1. Go to our web site at <http://www2.state.id.us/deq/water/water1.htm> and fill out an interactive form and e-mail it back to DEQ according to the site instructions.
2. Telephone your contact information to Joan Thomas (DEQ) at 208-373-0409.
3. Fill out the form below and mail it to the Idaho Drinking Water Program, 1410 N. Hilton, Boise, ID 83706.

Public Water System Name: _____ PWS# _____

Emergency Contact Name(s): _____

Emergency Daytime Telephone(s): _____
(may include pager or cell phone)

Emergency Night Time Telephone(s): _____
(may include pager or cell phone)

E-mail address (if available): _____



ARSENIC RULE UPDATE

EPA has approved an Idaho DEQ request for a two-year Arsenic Rule extension giving the state more time to adopt the federal rule. This extension does not affect the compliance date for systems, however, which is still January 23, 2006.

The January deadline marks the date when community and non-community non-transient water systems must be in compliance with the 10 parts per billion (ppb) standard.

Some Idaho systems may be eligible for "exemptions" that will provide extra time to comply with the revised MCL of 10 ppb. The Idaho DEQ and EPA Region X are currently working on an exemption application packet for systems.

The exemption applications are expected out by this summer. The US EPA will be reviewing all applications for the state of Idaho.

The next issue of the **Drinking Water Newsletter** will carry more information about which systems may be eligible for exemptions and how they can apply for an extension. ■

TRAINING SCHEDULE

Class/Sponsor	Location	Date
Hands on Pumps/Motors for Water/WW Systems ★	<i>Idaho Falls</i>	<i>April 8</i>
Hands on Pumps/Motors for Water/WW Systems ★	<i>Boise</i>	<i>April 9</i>
Safety (Chlorine, Trenching & Confined Spaces) ▲	<i>Idaho Falls</i>	<i>April 15</i>
First Aid and First Aid (r) ▲	<i>Idaho Falls</i>	<i>April 15, 16</i>
CPR and CPR (r) ▲	<i>Idaho Falls</i>	<i>April 16</i>
Capacity Development TFM ▲	<i>Idaho Falls</i>	<i>April 17</i>
Managing Resources ▲	<i>Idaho Falls</i>	<i>April 17</i>
Safety (Chlorine, Trenching & Confined Spaces) ▲	<i>Lewiston</i>	<i>April 28</i>
First Aid and First Aid (r) ▲	<i>Lewiston</i>	<i>April 28</i>
CPR and CPR (r) ▲	<i>Lewiston</i>	<i>April 29</i>
Industrial Pretreatment ★	<i>Meridian</i>	<i>April 29 - 30</i>
Capacity Development TFM ▲	<i>Lewiston</i>	<i>April 30</i>
Managing Resources ▲	<i>Lewiston</i>	<i>April 30</i>
★ <i>Brown Environmental, Inc. 1-800-543-4358 or for the Boise area, 208-465-5725. Fax: 208-465-8081</i> ▲ <i>Idaho Rural Water Association, 1-800-962-3257 or for the Boise area, 208-343-7001. Fax: 208-343-1866.</i>		

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